



The Commonwealth of Massachusetts
Department of State Police

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Mr. William Canton
Acting Secretary
Federal Communications Commission
Room 222
1919 M Street N.W.
Washington, DC 20554

November 3, 1997

Re: CC Docket Number 94-102
Written Ex Parte Presentation

Dear Mr. Canton:

I am writing in my capacity as Director of Communications for the Massachusetts State Police, in response to a question posed by your organization with reference to potential handset solution to the wireless 9-1-1 problem.

The question was whether or not the Public Safety Answering Points (PSAPs) would prefer to receive the verbal annunciation of position in terms of the call out of LAT/LONG as available from the handset solution or what would be available from Triangulation Systems (Phase II, infrastructure solution). While it is always quite gratifying to have available a completely integrated and automated system, the handset solution provides help to the PSAPs now.

From my viewpoint, assuming implementation of the so-called "infrastructure solution" will take at least two (2) years per community to implement after concurrence of the carriers, to

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say nothing of the cost. The "infrastructure solution" also requires local legislation so that the carriers can re-coop their costs. All of us in public service understand the formidable task of getting legislation that meets the needs of the issue, not to mention the elongated process for legislation.

On the other hand, the handset solution provides help now without the introduction of any infrastructure and provides, at the very least, a interim solution to the wireless 9-1-1 problem. In Massachusetts alone, there are over 40000 cellular 9-1-1 calls per month, with an average time to locate an individual in distress, who do not know their location, at ten (10) minutes. Currently, our PSAP receives calls from the two(2) original carriers over four (4) trunk lines. The specter of having to handle calls from additional carriers under the present scenario is concerning to say the least. This difficult situation is mirrored throughout the country.

The handset solution is one which is instantly implemented and is universal because GPS coverage is universal. What this means is that rather than having to wait for a solution for two years or more, it is my opinion that public safety would welcome location information in whatever form they can get it, so that lives can be saved, now. It is my experience that almost all PSAPs have maps with latitude and longitude capabilities or have electronic maps available in their dispatch centers. This means that the verbally transmitted position information from handset technology could be of immediate assistance to public safety.

In summary, while a integrated automatic system would be preferable, a solution which offers the PSAPs critical information now would be welcomed by the public safety community.

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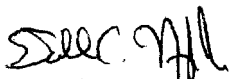
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The handset solution is all the more attractive because it cost the PSAPs nothing. Moreover, since there are no changes to cell site switches, the present wireless infrastructure need not be modified. Note, we have watched closely the development of a local company, Tendler Cellular and have tested the technology and feel that it works quite well. We have identified, as with all new technology there are training issues for success.

In closing, I have been quoted for some time that the FoneFinder handset type solution is better then nothing and at the present time there is nothing that can provide the location of a wireless 9-1-1 caller. I ask that you consider all of the available technologies, particularly the handset solution, even as an interim solution. Please, take into consideration all of the issues and the time required for a "infrastructure solution". Thank you for your attention, if you have any questions, please do not hesitate to call my office (508) 820-2226.

Sincerely,



Donald C. Nagle Jr.
Director of Communications